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January 23, 2020

Via ECF

Honorable Judge Gary R. Brown
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Trimboli v. County of Nassau, et al.
17-CV-7441

Dear Judge Brown:

This office represents the Plaintiff in the above matter. As the Court is aware, the parties have engaged in extensive settlement negotiations with the assistance of the Court over the course of a year, with multiple settlement conferences. Substantial time and effort has gone into constructing a settlement agreement with the Court's assistance. Part of the agreement involved the possibility of Your Honor holding a hearing to review a determination by New York State Retirement System ("NYSRS") regarding the payment of additional money to my client as overtime back pay. Your Honor creatively developed the plan to have this Court to hold a hearing in the event that the NYSRS would not include the back pay as part of the plaintiff's final average salary. The settlement largely hinged upon this and upon this Court retaining jurisdiction of this matter to oversee the settlement and the possible reinstatement of the case if the settlement is not consummated. In light of the Court's extensive involvement and the fact that the case may not settle without the Court's continued participation, the parties jointly request that Your Honor retain jurisdiction over this matter.

Thank you for your consideration of this request.

Respectfully submitted,

LEEDS BROWN LAW, P.C.

_____/s/_____
Rick Ostrove

Cc: Opposing Counsel and Magistrate Judge Lindsay (via ECF)